

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

IN RE:	)	
	)	Chapter 15
WHITE BURCH PAPER COMPANY, <u>et al.</u> , <sup>1</sup>	)	
	)	CASE NO. 10-31234-DOT
Debtors in a Foreign Proceeding.	)	
	)	Jointly Administered

---

**MOTION TO ADMIT PRO HAC VICE**

Robert H. Chappell, III, Esq. moves this Court for an Order authorizing certain attorneys from the law firm of Latham & Watkins, LLP to appear and represent Credit Suisse AG *pro hac vice* in the above-styled jointly-administered bankruptcy cases and any related adversary litigation. The attorneys for which admission *pro hac vice* is requested are Keith A. Simon, Esq. (“Mr. Simon”) and Adam J. Goldberg, Esq. (“Mr. Goldberg”) (together, the “Admittees”). In support of this motion, I state as follows:

---

<sup>1</sup> The Debtors in these cases are: White Birch Paper Company (“White Birch Paper”); Papier Masson Ltee (“Papier Masson”); Stadacona General Partner, Inc. (“Stadacona GP”); Stadacona Limited Partnership (“Stadacona LP”); F.F. Soucy Limited Partnership (“FF Soucy LP”); and F.F. Soucy Inc. & Partners, Limited Partnership (“FF Soucy & Partners LP”). The Debtors’ U.S. service address is 80 Field Point Road, Greenwich, Connecticut 06830.

David Heller, Esquire (*pro hac vice* pending)  
Keith A. Simon, Esquire (*pro hac vice* pending)  
Adam J. Goldberg, Esquire (*pro hac vice* pending)  
Latham & Watkins LLP  
885 Third Avenue  
New York, New York 10022  
Phone: (212) 906-1200  
Fax: (212) 751-4864

*Co-Counsel for Credit Suisse AG*

Robert H. Chappell, III, Esquire (VSB #31698)  
Neil E. McCullagh, Esquire (VSB #39027)  
Jennifer J. West, Esquire (VSB #47522)  
Erin E. Kessel, Esquire (VSB #65360)  
Spotts Fain PC  
411 East Franklin Street, Suite 600  
Richmond, Virginia 23219  
Phone: (804) 697-2000  
Fax: (804) 697-2100

*Co-Counsel for Credit Suisse AG*

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with the Admittees in this matter. My business address and bar number are as follows:

Robert H. Chappell, III (VSB #31698)  
Spotts Fain PC  
411 E. Franklin Street, Suite 600  
Richmond, VA 23219

2. Mr. Simon is a member in good standing of the Bar of the State of New York, the state of his residence, as well as the Bar of the State of Illinois, and is admitted to practice before the United States District Court for the Southern District of New York.

3. Mr. Goldberg is a member in good standing of the Bar of the State of New York, the state of his residence, and is admitted to practice before the United States District Court for the Southern District of New York.

4. Each of the Admittees has the following business address:

Latham & Watkins LLP  
885 Third Avenue  
New York, NY 10022-4834

5. Neither of the Admittees has been the subject of disciplinary action by the bar or courts of the State of New York, or any other state or any federal court.

6. Neither of the Admittees has been denied admission to the courts of any state or to any federal court.

7. Each of the Admittees has completed an Application To Qualify As A Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), copies of which are attached as **Exhibit A**.

8. A proposed Order granting this Motion is being submitted to the Court contemporaneously with the filing of this Motion.

WHEREFORE, Robert H. Chappell, III prays that this Court grant his Motion to permit the Admittees to represent Credit Suisse AG *pro hac vice* in this case and for such other and further relief as this Court deems just and proper.

Respectfully Submitted,

/s/ Robert H. Chappell, III

Robert H. Chappell, III, Esquire (VSB #31698)  
Neil E. McCullagh, Esquire (VSB #39027)  
Jennifer J. West, Esquire (VSB #47522)  
Erin E. Kessel, Esquire (VSB #65360)  
Spotts Fain PC  
411 East Franklin Street, Suite 600  
Richmond, Virginia 23219  
Phone: (804) 697-2000  
Fax: (804) 697-2100  
Co-Counsel for Credit Suisse AG

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2010, a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid or electronic means through the Court's ECF system or through email on the following, constituting all necessary parties:

Robert B. Van Arsdale, Esq.  
Office of the U. S. Trustee  
701 E. Broad St., Suite 4304  
Richmond, VA 23219  
[Robert.b.van.arsdale@usdoj.gov](mailto:Robert.b.van.arsdale@usdoj.gov)

Attn: Jay Epstein  
White Birch Paper Company  
80 Field Point Road  
Greenwich, Connecticut 06830

Christopher J. Marcus, Esq.  
Kirkland & Ellis LLP  
601 Lexington Avenue  
New York, NY 10022-4611  
[christopher.marcus@kirkland.com](mailto:christopher.marcus@kirkland.com)

Jonathan L. Hauser, Esq.  
Troutman Sanders LLP  
22 Central Park Avenue, Suite 2000  
P.O. Box 61185  
Virginia Beach, VA 23466-1185  
[Jonathan.hauser@troutmansanders.com](mailto:Jonathan.hauser@troutmansanders.com)

Angela L. Batterson, Esq.  
King & Spalding  
1185 Avenue of Americas  
New York, NY 10036-4003  
[abatterson@kslaw.com](mailto:abatterson@kslaw.com)

Benjamin B. Iselin, Esq.  
McGuire Woods LLP  
1345 Avenue of the Americas, 7<sup>th</sup> Floor  
New York, NY 10105-0106  
[biselin@mcguirewoods.com](mailto:biselin@mcguirewoods.com)

Scott D. Talmadge, Esq.  
Kaye Scholer LLP  
425 Park Avenue  
New York, NY 10022-3598  
[stalmadge@kayescholer.com](mailto:stalmadge@kayescholer.com)

/s/ Robert H. Chappell, III